

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TARGET CORPORATION et al.,

Plaintiffs,

v.

VISA INC. et al.,

Defendants.

7-ELEVEN, INC. et al.,

Plaintiffs,

v.

VISA INC. et al.,

Defendants.

Case No. 13 Civ. 3477 (AKH)

Case No. 13 Civ. 4442 (AKH)

PLAINTIFFS' NOTICE OF MOTION FOR LEAVE TO FILE UNDER SEAL MATERIALS IN CONNECTION WITH PLAINTIFFS' MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTION FOR A REVISED SUMMARY JUDGMENT RULING UNDER FRCP 54(B)

PLEASE TAKE NOTICE THAT, pursuant to Rule 4(B)(i) of this Court's Individual Rules, Plaintiffs in the above-captioned actions respectfully move this court, before the Honorable Alvin K. Hellerstein, United States District Judge, in Courtroom 14D of the Daniel Patrick Moynihan United States Courthouse, located at 500 Pearl Street, New York, New York 10007, at a date and time to be determined by the Court, for leave to file under seal unredacted versions of the following:

- Plaintiffs' Opposition to Defendants' Motion for a Revised Summary Judgment Ruling Under Federal Rule of Civil Procedure 54(b);

*So ordered
11-21-24
Alvin K. Hellerstein*

- Exhibits 1 and 2 to the Transmittal Declarations of James A. Wilson and Jeffrey I. Shinder in Support of Plaintiffs' Opposition to Defendants' Motion for a Revised Summary Judgment Ruling Under Federal Rule of Civil Procedure 54(b).

Thus, pursuant to Rule 4(B)(i) of this Court's Individual Rules, Plaintiffs are contemporaneously with this motion (i) filing on ECF partially redacted copies of the above-listed documents, as described in the accompanying memorandum of law in support of this motion; (ii) submitting unredacted copies of these materials to the Court; and (iii) serving unredacted copies on counsel for Defendants.

The grounds for this motion are set forth in the accompanying memorandum of law.

Respectfully submitted,

CONSTANTINE CANNON LLP

/s/ Jeffrey I. Shinder
 Jeffrey I. Shinder
 Matthew L. Cantor
 A. Owen Glist
 Ankur Kapoor
 Taline Sahakian
 David A. Scupp
 6 East 43rd Street, 26th Floor
 New York, NY 10017
 (212) 350-2700
 jshinder@constantinecannon.com

Attorneys for 7-Eleven Plaintiffs

Dated: September 4, 2024

VORYS, SATER, SEYMOUR AND PEASE LLP

/s/ James A. Wilson
 James A. Wilson
 Robert N. Webner
 Douglas R. Matthews
 Kimberly Weber Herlihy
 Alycia N. Broz
 Kenneth J. Rubin
 52 East Gay Street
 Columbus, OH 43215
 (614) 464-6400
 jawilson@vorys.com

GIBBS & BRUNS LLP

Kathy D. Patrick
 Barrett Reasoner
 Jorge Gutierrez
 Nick Beachy
 Shannon N. Smith
 Erica Krennerich

1100 Louisiana Street, Suite 5300
Houston, Texas 77002
(713) 650-8805
kpatrick@gibbsbruns.com

Attorneys for Target Plaintiffs